

December 12, 2024

BY ECF

The Honorable Katharine H. Parker

Daniel Patrick Moynihan

United States Courthouse

500 Pearl Street

New York, New York 10007-1312

Re: City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,

Case No. 15 Civ. 5345 (JGK) (KHP)

Dear Judge Parker,

I write this letter to address the motion for civil contempt filed against me. First and foremost, I want to sincerely apologize to the Court for failing to submit the required quarterly reports in a timely manner. I deeply regret my non-compliance and the inconvenience it has caused.

I would like to bring to the Court's attention that BTA Bank has obtained a default judgment against me, which was recognized in the United States in the amount of \$505,139,469.42 on April 27, 2023. This judgment has been accruing interest at a rate of 9 percent per annum since then. This substantial financial obligation highlights the severe constraints on my current ability to pay the sanctions ordered by this Court. Furthermore, the sanctions in question do not cause significant additional damage to BTA Bank in light of this existing financial obligation.

I also wish to explain the challenges I face in improving my financial situation. Following one of my reports to the Court, in which I mentioned the possibility of working as an external consultant for a litigation finance company, Bloomberg Law, by coincidence or not published an article titled "Man Linked to Money Laundering Aids Litigation Finance Startup."¹ The headline was incorrect, as I have never been convicted of money laundering.

¹ <https://news.bloomberglaw.com/business-and-practice/man-linked-to-money-laundering-aids-litigation-finance-startup#>

The only related case I am aware of, in Switzerland, was closed with a full acquittal under Swiss law. Whether the article's timing was coincidental or not, such public exposure damages my prospects of finding work in any industry, including litigation finance, and does not assist BTA Bank in achieving its goal of receiving payment.

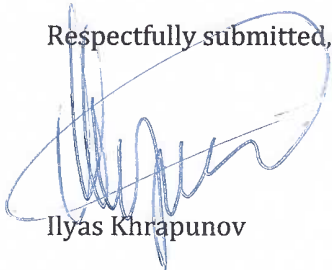
Given the absence of any material changes in my financial situation and the negative impact of such media attention, I respectfully request the Court to consider amending the reporting requirement from quarterly to annual updates. This would provide a more realistic timeframe for any meaningful changes in my financial status and reduce the likelihood of further adverse media coverage.

I remain committed to fulfilling my obligations to the best of my ability and complying with the Court's orders. I respectfully ask the Court to take into account these circumstances and my sincere apology when deciding on the motion for civil contempt and my request to modify the reporting schedule.

Sworn Declaration

I, Ilyas Khrapunov, hereby declare under penalty of perjury that my financial situation has not improved since I originally demonstrated my inability to pay the sanction. I have not been able to work, and I am able to meet my living expenses only through assistance from my family. I will provide the court with copies as soon as I get tax decisions from Geneva tax authorities for 2023 and 2024. As with the decision for the year 2022, it will reflect my current financial situation. I attach the accounts at the tax office for the 2023 and 2024, that have not been determined as of now and so are shown to be at zero. I provide this declaration in good faith and with the understanding of its significance in these proceedings.

Respectfully submitted,



Ilyas Khrapunov



REPUBLIQUE ET CANTON DE GENEVE

Département des finances

Administration fiscale cantonale**Impôt Fédéral Direct / 2023 / 1****Monsieur KHRAPUNOV ILIYAS****Madame** [REDACTED]**N° dossier fiscal :** [REDACTED]**N° compte :** [REDACTED]**Situation de votre compte au 08.12.2024***Des paiements effectués dernièrement peuvent ne pas figurer sur ce relevé.*

Valeur	Opération	Mouvements	Débit	Crédit
		Totaux		
		Solde		0.00

Nous attirons votre attention sur le caractère purement informatif du présent relevé.



REPUBLIQUE ET CANTON DE GENEVE

Département des finances

Administration fiscale cantonale

Impôts Cantonaux et Communaux / 2023 / 1

Monsieur KHRAPUNOV ILIYAS

Madame [REDACTED]

N° dossier fiscal : [REDACTED]

N° compte : [REDACTED]

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